



DOCKET FILE COPY ORIGINAL

EX PARTE OR LATE FILED

Anne U. MacClintock  
Vice President  
Regulatory Affairs & Public Policy

227 Church Street  
New Haven, CT 06510  
Phone 203.771.8865  
Fax 203.624.3549

October 31, 1997

RECEIVED

OCT 31 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Mr. William F. Caton, Acting Secretary  
Federal Communications Commission  
Suite 222  
1919 M Street NW  
Washington, DC 20554

**Written Ex Parte:** **RM-9101**, Petition for Expedited Rulemaking of LCI International Telecom Corp. and Competitive Telecommunications Association to Establish Technical Standards for Operations Support Systems

Dear Mr. Caton:

Pursuant to Part 1.1206(a)(1) of the Rules of the Federal Communications Commission (Commission) (47 C.F.R. § 1.1206(a)(1)), The Southern New England Telephone Company (SNET) hereby files an original and two copies of this written ex parte presentation in the above captioned proceeding.

This presentation responds to the Commission's verbal request for comments on the ex parte presented to members of the Commission's staff on September 26, 1997, and filed September 29, 1997 (and revised October 8, 1997) by LCI International Telecom Corp. (LCI) in this proceeding. That filing included an attached "Service Quality Measurements Detail Document" as prepared by the Local Competition Users Group (LCUG) (LCI/LCUG Written Ex Parte).

SNET fully supports the establishment of service quality measurements to gauge its performance in the provision of services to competitive local exchange carriers (CLECs). In this regard, on April 15, 1997, SNET proposed a set of service standards and financial remedies in the provision of its services to the Connecticut Department of Public Utility Control (CTDPUC). The CTDPUC is currently conducting a formal proceeding to evaluate these proposals, and to assure that CLECs obtain adequate access to SNET's operations support systems (OSSs).<sup>1</sup> SNET is proposing the adoption of 20 monthly service measurements, with financial remedies. SNET's proposed service standards measure both performance and

<sup>1</sup> Application of The Southern New England Telephone Company's Proposed Service Standards and Financial Remedies for Resold Services and Unbundled Elements, Docket No. 97-04-23 (CTDPUC Service Standards Docket). This proceeding is to be completed in November, 1997.

No. of Copies rec'd  
ABCDE

072

comparability. The performance standards measure the quality of service levels, while the comparability standards ensure that the levels of service provided to CLECs by SNET are not discriminatory.

In the CTDPU's Service Standards Docket, MCI and AT&T counter-proposed an overwhelming array of more than 100 service quality measurements. These measurements and performance standards appear to be identical to those proposed by LCI International and the Local Competition Users Group (LCI/LCUG) in their Petition for Expedited Rulemaking filed with the Commission on May 30, 1997, and in their Written Ex Parte filed on September 29, 1997, and revised October 8, 1997.

LCI/LCUG appears to propose only 27 measures.<sup>2</sup> However, once these measures are tabulated by the various Dimensions proposed by LCI/LCUG,<sup>3</sup> as well as by the number of wire centers, and by the number of CLECs operating in SNET's area, there would be over eight million service results each month.<sup>4</sup> This proposed disaggregation of measurements by service family, and by trouble type, and by order type, and by geographic scope, for example, would dilute basic performance data, and create a maze of minuscule measures that simply would not provide the Commission, the CLECs, or SNET with meaningful information that would help meet service commitments or otherwise benefit end users.

LCI/LCUG has not provided any meaningful explanation how its vast array of ILEC measures would benefit end user consumers. In fact, the minutely detailed measures would only clog and slow the progress toward providing the requested services efficiently. The highly disaggregated level of detail proposed by LCI/LCUG would provide little if any indication what level of service end users as a whole are experiencing. In addition, the proposals require extremely high ILEC standards of performance, but seem to exonerate CLECs from providing accurate input.<sup>5</sup>

The overwhelming array of measurements proposed by LCI/LCUG poses a serious impediment to the advancement of local competition. While CLECs seek quick responses from incumbent local exchange carriers (ILECs) to meet service

---

<sup>2</sup> LCI/LCUG Written Ex Parte, "Formula Quick Reference," pgs. 17-19.

<sup>3</sup> LCI/LCUG Written Ex Parte, Appendix A, "Reporting Dimensions."

<sup>4</sup> Brief of The Southern New England Telephone Company, Docket No. 97-04-23, October 24, 1997 (Attachment 4 to this ex parte letter), at pg. 13.

<sup>5</sup> For example: "The response interval for each pre-ordering query is determined by computing the elapsed time fro the ILEC receipt of a query from the CLEC whether or not syntactically correct ..." LCI/LCUG Written Ex Parte, Service Quality Measurement Detail, pg. 21 (emphasis added).

commitments, the ILECs subject to the measurements would have to spend an inordinate amount of human, mechanical, and electronic resources to capture and report the highly disaggregated measurements. Ironically, this would divert ILEC resources from meeting CLEC customer service requirements efficiently, and from expediting service to their customers.

In its negotiated and arbitrated intrastate agreements for network interconnection, unbundling and resale, SNET has committed to maintaining specific, monthly quality of service measurements, such as reports per hundred lines, switch outage minutes per access, repair appointments met, installation appointments met, installation interval, mean time to repair, repair answer time, and directory assistance answer time. These measures are consistent with CTDPUC decisions in several proceedings. The CTDPUC's review of the interconnection agreements has not resulted in any modifications to the quality of service measurements.

Lastly, and perhaps most importantly, the July 18, 1997 Decision of the United States Court of Appeals for the Eighth Circuit reaffirmed the jurisdiction of state commissions and federal courts over agreements for interconnection, unbundling of network elements and resale.<sup>6</sup> The Court Decision makes clear that the Commission lacks authority to grant the relief requested in the LCI/CompTel Petition for Expedited Rulemaking.<sup>7</sup> Further, as the CTDPUC is establishing service quality measurements in connection with its intrastate regulations regarding interconnection, unbundling and resale, there is simply no need for duplicate federal standards in this area.

In order to assemble a full and open record on these matters in the instant proceeding, SNET attaches to this ex parte presentation the following documents:

- Attachment 1: a chart prepared by SNET to cross-reference each LCUG proposed measurement with SNET's proposed measurements in the CTDPUC Service Standards Docket, and to provide a brief SNET analysis of the particular proposed LCUG measurement;
- Attachment 2: "Joint Supplemental Testimony of Fred T. Page and Michael L. Bencivengo," President - SNET Network Services, and Director - SNET

---

<sup>6</sup> Iowa Utilities Board v. FCC, Docket No. 96-3321, 1997 U.S. App LEXIS 18183 (8th Circuit, July 18, 1997) (Court Decision).

<sup>7</sup> See, e.g., Court Decision at pgs. 49-50: "... the obligations imposed by sections 251 and 252 fundamentally involve local intrastate telecommunications matters. Consequently, the state commission determinations that the FCC seeks to review and the [ILEC-CLEC interconnection and resale] agreements that it seeks to enforce also fundamentally deal with intrastate telecommunications matters. To reiterate, section 2(b) prevents the FCC from having jurisdiction over 'charges, classifications, practices, services, facilities, or regulations for or in connection with intrastate communication service. . . ." (Citation omitted, emphasis added.)

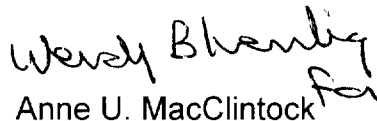
Interconnection Services respectively, filed in the CTDPU Service Standards Docket, August 11, 1997. The CLEC/LCUG measurement proposals are discussed in pages 2-6 of the Testimony, and in Attachment A, "Comparison and Analysis of SNET's Proposed Service Measures and Those Proposed by the Local Competition Users Group;"

- Attachment 3: "Pre-Filed Testimony of Mr. Steve Allen," an expert in public utility operations, management audits, and service measurements, filed in the CTDPU Service Standards Docket, August 15, 1997. The CLEC/LCUG measurement proposals are discussed in pages 4-12 of Mr. Allen's Testimony;
- Attachment 4: "Brief of The Southern New England Telephone Company," filed in the CTDPU Service Standards Docket, October 24, 1997. The CLEC/LCUG measurement proposals are discussed in pages 11-16 of the Brief.

SNET strongly urges the Commission to deny the LCI/CompTel Petition for Expedited Rulemaking, and to refer the issue of OSS service measurements to the state commissions.

Please place a copy of this presentation in the public record of this proceeding. SNET has served this written ex parte upon all parties of record in this proceeding. Please call should you have any questions. Thank you for your attention.

Respectfully submitted,

  
Anne U. MacClintock

Vice President - Regulatory Affairs  
and Public Policy

#### Attachments

cc: Thomas Boasberg (letter and Attachment 1 only)  
James Casserly (letter and Attachment 1 only)  
Kathy Franco (letter and Attachment 1 only)  
Paul Gallant (letter and Attachment 1 only)  
Richard Welch  
Jake Jennings  
Wendy Lader  
Service List

**Written Ex Parte of The Southern New England Telephone Company**

RM-9101  
October 31, 1997  
**Attachment 1**  
Page 1 of 4

**Cross Reference Chart of LCUG Measurements**

<b>LCUG Name<sup>1</sup></b>	<b>Proposed LCUG Service Quality Measure,<sup>2</sup> found at:<sup>3</sup></b>	<b>Comment by Telco on LCUG Measure, found at:<sup>4</sup></b>	<b>Measure Proposed by Telco at CTDPU, found at:<sup>5</sup></b>
PO-1	Average Response Interval for Pre-Ordering Information, pg. 22 (by 9 pre-ordering query types, by geographic scope).	"Notes" column, page 1 of 5, Line 1.	"SNET Service Quality Measures" column, page 1 of 5, Line 1.
OP-1	Average Completion Interval, pg. 24 (by 15 standard service groupings, by 7 standard order activities, by geographic scope).	"Notes" column, page 1 of 5, Line 2.	SNET will report the Average Service Order Completion Interval in actual average business days achieved by SNET for each CLEC and SNET's retail

<sup>1</sup> Written Ex Parte of LCI International and Local Competition Users Group, RM-9101, filed September 26, 1997 ("LCI/LCUG Written Ex Parte"), Service Quality Measurements, Formula Quick Reference, pgs. 18-20.

<sup>2</sup> LCUG proposes its measurements in a wide array of dimensions, in addition to the format recommended in the "Measurement Detail" section. The additional dimensions include, for example, by geographic scope (possibly by wire center), by standard service groupings (15 groupings), by standard order activities (seven activities), by pre-ordering query types (nine types), by transmission quality parameter (six parameters), by speed of connection parameters (three types), by reliability parameters (two types), by disposition and cause (ten types). These dimensions increase geometrically the number of measurements and reports ILECs would be required to provide, potentially to over eight million per reporting period.

<sup>3</sup> LCI/LCUG Written Ex Parte, Service Quality Measurements, Measurement Detail, pgs. 21-55.

<sup>4</sup> Application of the Southern New England Telephone Company's Proposed Service Standards and Financial Remedies for Resold Services and Unbundled Elements, Docket No. 97-04-23, Joint Supplemental Testimony of Fred T. Page and Michael L. Bencivengo, filed August 11, 1997, Attachment A to the Testimony, pgs. 1-5 ("SNET Attachment A").

<sup>5</sup> SNET Attachment A. If there is any difference between a measurement described in Attachment A, and that measurement as described in the Joint Supplemental Testimony of Fred T. Page and Michael L. Bencivengo, the later description in the Supplemental Testimony prevails, as the refinement of service measurements is an evolving process.

**Written Ex Parte of The Southern New England Telephone Company**

RM-9101

October 31, 1997

**Attachment 1**

Page 2 of 4

**Cross Reference Chart of LCUG Measurements**

			organization, for POTS, Digital Specials, and Analog Specials.
OP-2	Percent Orders Completed on Time, pg. 26 (by 15 standard service groupings).	"Notes" column, page 1 of 5, Line 2	"SNET Service Quality Measures" column, page 1 of 5, Line 2.
OP-3	Percent Order Accuracy, pg. 26 (by 15 standard service groupings).	"Notes" column, page 1 of 5, Line 3.	"SNET Service Quality Measures" column, page 1 of 5, Line 3.
OP-4	Mean Reject Interval, pg. 30 (by 7 standard order activities, by geographic scope).	"Notes" column, page 2 of 5, Line 4.	"SNET Service Quality Measures" column, page 2 of 5, Line 4.
OP-5	Mean FOC Interval, pg. 33 (by 7 standard order activities, by geographic scope).	"Notes" column, page 2 of 5, Line 4	"SNET Service Quality Measures" column, page 2 of 5, Line 4.
OP-6	Mean Jeopardy Interval, pg. 34 (by 7 standard order activities, by geographic scope).	"Notes" column, page 2 of 5, Line 4.	"SNET Service Quality Measures" column, page 2 of 5, Line 4.
OP-7	Mean Completion Interval, pg. 37 (by 7 standard order activities, by geographic scope).	"Notes" column, page 2 of 5, Line 4	SNET will report the Mean Service Order Completion Interval in actual average business days achieved by SNET for each CLEC and SNET's retail organization, for POTS, Digital Specials, and Analog Specials.
OP-8	Percent Jeopardies Returned, pg. 38 (by 7 standard order activities, by geographic scope).	"Notes" column, page 2 of 5, Line 4.	"SNET Service Quality Measures" column, page 2 of 5, Line 4.
OP-9	Mean Held Order Interval, pg. 30 (by 15 standard service groupings, by 4 reasons for hold, by geographic scope).	"Notes" column, page 2 of 5, Line 5.	"SNET Service Quality Measures" column, page 2 of 5, Line 5.
OP-10	Percent Orders Held $\geq$ 90 days, pg. 31 (by 15 standard service groupings, by 4 reasons for hold, by geographic scope).	"Notes" column, page 2 of 5, Line 5.	"SNET Service Quality Measures" column, page 3 of 5, Line 5.
OP-11	Percent Orders Held $\geq$ 15 days, pg. 31 (by 15 standard service groupings, by 4 reasons for	"Notes" column, page 2 of 5, Line 5.	"SNET Service Quality Measures" column, page 2 of 5, Line 5, and page 3 of 5, Line

10/30/97

**Written Ex Parte of The Southern New England Telephone Company**

RM-9101  
October 31, 1997  
**Attachment 1**  
Page 3 of 4

**Cross Reference Chart of LCUG Measurements**

	hold, by geographic scope).		7.
MR-1	Maintenance Time to Restore, pg. 33 (by 15 standard service groupings, by 10 dispositions and causes, by geographic scope).	"Notes" column, page 2 of 5, Line 6	"SNET Service Quality Measures" column, page 2 of 5, Line 6.
MR-2	Repeat Trouble Rate, pg. 34 (by 15 standard service groupings, by 10 dispositions and causes, by geographic scope).	"Notes" column, page 3 of 5, Line 8.	"SNET Service Quality Measures" column, page 3 of 5, Line 8.
MR-3	Trouble Rate per 100 lines, pg. 37 (by 15 standard service groupings, by 10 dispositions and causes, by geographic scope).	"Notes" column, page 3 of 5, Line 9.	"SNET Service Quality Measures" column, page 3 of 5, Line 9.
MR-4	Percent of Customer Troubles Resolved Within Estimate, pg. 38 (by 15 standard service groupings, by 10 dispositions and causes, by geographic scope).	"Notes" column, page 3 of 5, Line 10.	"SNET Service Quality Measures" column, page 3 of 5, Line 10.
GE-1	Percent Systems Availability, pg. 40 (by interface type for each functional area [referred to but not found in Appendix A], by business period).	"Notes" column, page 3 of 5, Line 11.	"SNET Service Quality Measures" column, page 3 of 5, Line 11.
GE-2	Mean Time to Answer Calls/Speed of Answer, pg. 41 (by 4 support center types).	"Notes" column, page 3 of 5, Line 12.	"SNET Service Quality Measures" column, page 3 of 5, Line 12.
GE-3	Call Abandonment Rate, pg. 41 (by 4 support center types).	"Notes" column, page 3 of 5, Line 13.	"SNET Service Quality Measures" column, page 3 of 5, Line 12.
BI-1	Mean Time to Provide Recorded Usage Records, pg. 44 (by end user usage, by access usage, by alternately billed usage, by wholesale bill invoices, by unbundled element invoices).	"Notes" column, page 3 of 5, Line 12.	"SNET Service Quality Measures" column, page 3 of 5, Line 13.
BI-2	Mean Time to Deliver Invoices, pg. 44 (by end user usage, by access usage, by alternately	"Notes" column, page 3 of 5, Line 13.	"SNET Service Quality Measures" column, page 3 of 5, Line 13.

10/30/97

**Written Ex Parte of The Southern New England Telephone Company**

RM-9101  
October 31, 1997  
**Attachment 1**  
Page 4 of 4

**Cross Reference Chart of LCUG Measurements**

	billed usage, by wholesale bill invoices, by unbundled element invoices).		
BI-3	Percent Invoice Accuracy, pg. 46 (by end user usage, by access usage, by alternately billed usage, by wholesale bill invoices, by unbundled element invoices).	"Notes" column, page 3 of 5, Line 13.	"SNET Service Quality Measures" column, page 3 of 5, Line 12.
BI-4	Percent Usage Accuracy, pg. 46 (by end user usage, by access usage, by alternately billed usage, by wholesale bill invoices, by unbundled element invoices).	"Notes" column, page 3 of 5, Line 13.	"SNET Service Quality Measures" column, page 3 of 5, Line 13.
OS/DA-1	Mean Time to Answer, pg. 48 (by operator services in aggregate, by directory assistance, by human processing, by machine processing).	"Notes" column, page 4 of 5, Line 14.	"SNET Service Quality Measures" column, page 4 of 5, Line 14.
NP-1	Network Performance Parity, pg. 50 (by 6 transmission qualities, by 3 speeds of connection, by 2 reliability parameters).	"Notes" column, page 4 of 5, Line 15.	"SNET Service Quality Measures" column, page 4 of 5, Line 15.
IUE-1	Availability of Network Elements, pg. 51 (by any unique UNE or UNE combinations requested by CLECs).	"Notes" column, page 4 of 5, Line 16.	"SNET Service Quality Measures" column, page 4 of 5, Line 16.
IUE-2	Performance of Network Elements, pg. 52 (by any unique UNE or UNE combinations requested by CLECs).	"Notes" column, page 5 of 5, Line 17.	"SNET Service Quality Measures" column, page 5 of 5, Line 17.

10/30/97

**Written Ex Parte of The Southern New England Telephone Company**

RM-9101

October 31, 1997

**Attachment 2:**

"Joint Supplemental Testimony of Fred T. Page and Michael L. Bencivengo,"

Including "Attachment A"

August 11, 1997



Southern New England Telephone  
227 Church Street  
New Haven, Connecticut 06510  
Phone (203) 771-3802  
Fax (203) 498-7321

Kathleen A. Carrigan  
Senior Counsel

August 11, 1997

Robert J. Murphy, Executive Secretary  
Department of Public Utility Control  
Ten Franklin Square  
New Britain, Connecticut 06051

Re: Docket No. 97-04-23  
Application of The Southern New England Telephone Company's Proposed  
Service Standards and Financial Remedies for Resold Services and Unbundled  
Elements

Dear Mr. Murphy:

The Southern New England Telephone Company herein files an original and eleven (11) copies of the JOINT SUPPLEMENTAL TESTIMONY of Fred T. Page and Michael L. Bencivengo, in the above-referenced docket. Also, enclosed is diskette in Word for Windows 6.0 containing the Joint Supplemental Testimony.

Service has been made pursuant to §16-1-15 of the Regulations of Connecticut State Agencies.

Should there be any questions concerning this submission, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in cursive script, reading "Kathleen A. Carrigan".

## **SUPPLEMENTAL TESTIMONY OF FRED T. PAGE and MICHAEL L. BENCIVENGO**

1 Q. State your full names and business addresses.

2 A. My name is Fred T. Page. My business address is 84 Deerfield Lane, Meriden,  
3 CT.

4 A. My name is Michael L. Bencivengo. My business address is 1441 North Colony  
5 Rd., Meriden, CT.

6 Q. What is the purpose of your supplemental testimony?

7 A. The purpose of this supplemental testimony is to discuss (i) SNET's proposed  
8 service measurements; (ii) the Local Competition Users Group's proposed  
9 measurements; and (iii) timing of service measurements and financial remedies.

10 SNET's goal as a wholesale network provider is to be the pre-eminent  
11 supplier of network services in the State of Connecticut. To that end, SNET  
12 strives to provide exceptional service to all its customers. SNET's proposed  
13 service measurements reflect that goal of excellence and SNET's commitment to  
14 the highest standards. These are unlike service standards generally prevalent  
15 elsewhere in that they reflect a targeted level of excellence rather than a threshold  
16 for acceptable service. Because SNET has continuously strived to provide an  
17 excellent level of service, in effect, it has provided a comparably good level of  
18 service over the years, even when conditions caused SNET to miss the targeted  
19 objectives.

### **20 PROPOSED SERVICE MEASUREMENTS**

21 Q. What are the federal requirements regarding SNET's provision of service to  
22 CLECs?

**SUPPLEMENTAL TESTIMONY OF FRED T. PAGE and MICHAEL L. BENCIVENGO**

1 A. Section 251(c)(2)(c) of the Telecommunication's Act of 1996 ("Act") requires  
2 SNET to provide service to CLECs that is at least equal in quality to that which it  
3 provides itself or any subsidiary, affiliate, or any other party to which SNET  
4 provides interconnection.

5 Q. In their separate comments dated May 23, 1997 filed in this proceeding, both  
6 AT&T and MCI state that SNET's proposed service measurements are  
7 inadequate. How does SNET's proposed measurements satisfy the requirements  
8 of the Act?

9 A. SNET is proposing a total of 19 service measurements which will provide a  
10 comparison of the quality of service SNET provides to all its wholesale customers.  
11 These measurements address the areas of pre-ordering, ordering (three measures  
12 regarding mechanized interface availability for the Mechanized Services Access  
13 Platform<sup>1</sup>), provisioning (six measures), maintenance and repair (seven measures),  
14 and end user usage billing data (three measures). The specific measurements are  
15 listed and described in Exhibit MLB-1 attached to the joint testimony of Fred Page  
16 and Michael Bencivengo filed on April 15, 1997 in this docket, and as amended  
17 May 14, 1997.

18 Q. How do these measures address comparability of services provided to customers,  
19 including SNET itself?

20 A. Exhibit MLB-1 describes how each proposed measurement will reflect a  
21 comparison of services provided by SNET to CLECs and SNET to itself.

---

<sup>1</sup> These measurements include (1) 98% Average Service Request Acknowledge <=5 seconds; (2) % Availability of Mechanized Interface >=98.9%; and (3) 90% Firm Order Confirmation (FOC), within 24 hours.

**SUPPLEMENTAL TESTIMONY OF FRED T. PAGE and MICHAEL L. BENCIVENGO**

1       Wherever possible, data will be segregated by CLEC and reported accordingly,  
2       reflecting a comparison between service provided to an individual CLEC, to all  
3       CLECs, and to SNET itself. SNET is committed to providing nondiscriminatory  
4       service to all its wholesale customers of like type services.

5   Q.   Is SNET's ability to provide excellent, comparable service affected by the CLECs'  
6       performance?

7   A.   Yes. In the areas of pre-ordering, ordering and provisioning, SNET is dependent  
8       upon the CLECs to provide complete, accurate, and timely input. The absence of  
9       quality input could cause SNET to miss its service objectives. For example, if a  
10      CLEC places an order that is subsequently rejected in downstream provisioning  
11      systems due to the CLEC's error, that order may not be completed by the initial  
12      offered due date. This would be reflected in the "Installation Appointments Met"  
13      measurement. A single error may not cause overall bad results, but, if one or more  
14      CLECs were to provide consistently faulty input, the resulting dip in measured  
15      results would not reflect less than excellent service or discrimination on the part of  
16      SNET, but would rather be indicative of the CLECs' performance. Changes to  
17      CLEC orders after provisioning has begun would cause similarly skewed results.

18   Q.   Is SNET's maintenance of service also affected by the CLECs' performance?

19   A.   Yes. When an end user's service is comprised of network components supplied by  
20      multiple providers, each provider has the responsibility to maintain that portion of  
21      the service that it provides. If a CLEC has given SNET inaccurate or untimely  
22      input regarding a trouble on an end user's line, SNET may not be able to clear the  
23      trouble through standard means and within the committed time frame. This would

**SUPPLEMENTAL TESTIMONY OF FRED T. PAGE and MICHAEL L. BENCIVENGO**

1 be reflected in the "Maintenance Appointments Met", "Mean Time to Repair"  
2 and/or "Network Reports per 100 Lines" measurements. This would not be a true  
3 reflection of SNET's quality of service, but again, would be a reflection of the  
4 CLEC's performance and its inability to properly isolate the trouble.

5 Q. Do the proposed measurements consider the CLECs' role in providing quality  
6 service?

7 A. Yes, to some degree. Tracking of SNET's performance begins when SNET  
8 receives accurate and complete account and end user information from a CLEC as  
9 it pertains to placement of a service order or trouble report. However, the  
10 measurements do not accommodate all CLEC-affected activities. For example, the  
11 "Installation Appointments Met" percentage was established with the expectation  
12 that there would be minimal CLEC changes (e.g., changes to the CLEC's original  
13 service request) during the provisioning process. If, in fact, a significant volume of  
14 changes were to occur for a particular CLEC, SNET would likely miss its  
15 objective for that CLEC and would appear to be providing a lesser grade of  
16 service. In that event, SNET may need to track the CLEC's performance as it  
17 affects SNET and request adjustment of the measurements and/or remedies  
18 accordingly.

19 In establishing service standards by which SNET will be measured, it is  
20 important, therefore, that the CLECs' responsibilities are considered. SNET's  
21 proposed measurements and associated remedies recognize, to some degree, the  
22 multi-party involvement in providing end user service, the associated complexity,  
23 and the need for CLECs to use effective and efficient service delivery processes. It

## **SUPPLEMENTAL TESTIMONY OF FRED T. PAGE and MICHAEL L. BENCIVENGO**

1 is not SNET's intention at this time to formally track the CLECs' performance,  
2 however, that may become necessary should it appear that the CLECs are failing  
3 to meet their responsibilities. In that event, SNET may request the Department to  
4 modify the required measurements and/or remedies based on actual CLEC  
5 performance.

### **7 LOCAL COMPETITION USERS GROUP'S PROPOSED SERVICE**

#### **8 MEASUREMENTS**

9 A. Has SNET had an opportunity to review and analyze the service standards  
10 proposed by AT&T?

11 A. Yes. In general, the Company found that the service standards proposed by  
12 AT&T are comprised of the same standards as those proposed by the Local  
13 Competition Users Group ("LCUG").

14 Our analysis found that a number of the proposed service objectives are  
15 oriented toward establishing performance standards that exceed service standards  
16 SNET has for itself, as well as any affiliate and other telecommunications carriers.  
17 In addition, the Company found that some proposed measures are more oriented  
18 toward process rather than delivery of service to achieve committed intervals and  
19 objectives. This orientation toward process rather than results is best illustrated in  
20 AT&T's May 23, 1997 Response to SNET's Proposal, Attachment A, which  
21 reflects multiple pre-ordering time frames for specific measurements. Additionally,  
22 the proposed standards represents multiple maintenance and repair time frames and  
23 intervals which reflect both process measures and a superior level of service.

**SUPPLEMENTAL TESTIMONY OF FRED T. PAGE and MICHAEL L. BENCIVENGO**

1           The Company provides a detailed comparison between the proposed  
2           LCUG measurements and the SNET proposed measurements in the attached  
3           Exhibit MLB-5.

4    Q.    Is SNET proposing to adopt the LCUG measurements?

5    A.    No. SNET's proposed measurements are sufficient to ensure excellent service that  
6           is consistent with what it provides to itself. Adopting the LCUG measurements is  
7           unnecessary, would be time consuming, costly, and would slow down  
8           implementation of the important results oriented measures that SNET proposed.  
9           SNET would consider developing additional measures if a CLEC issued a Bona  
10          Fide Request, and the requesting CLEC was willing to pay SNET for the initial  
11          and recurring costs associated with creating and tracking the additional requested  
12          measurements.

13   Q.    Is SNET's position affected by the Eighth Circuit Court's ("Court") ruling in Iowa  
14          Utilities Board v. FCC, Dkt No. 96-3321, 1997 U.S. App. LEXIS 18183 (8th Cir.,  
15          July 18, 1997)?

16   A.    As mentioned earlier in this testimony, the Act states that an incumbent LEC  
17          ("ILEC") must provide service at least equal in quality to that which it provides to  
18          itself. The FCC interpreted that to mean that an ILEC must provide superior  
19          service on the request of a CLEC. However, the Eighth Circuit Court stated that  
20          the FCC overstepped its bounds in requiring that superior service be made  
21          available on request. SNET maintains its position that it would certainly consider  
22          providing additional service measurements if the requesting CLEC is willing to pay  
23          for it. SNET, however, retains the option of denying such a request, particularly

## **SUPPLEMENTAL TESTIMONY OF FRED T. PAGE and MICHAEL L. BENCIVENGO**

1           given the press of other activity that needs to get done to ensure effective service  
2           delivery and measurement.

### **4   TIMING OF SERVICE MEASUREMENTS AND FINANCIAL REMEDIES**

5   Q.   Does SNET still expect to implement its proposed service measures effective  
6           October 1, 1997?

7   A.   SNET originally proposed October 1, 1997. However, due to the change in the  
8           schedule for this proceeding, SNET expects that if the Department accepts its  
9           proposed measures they could become effective December 1, 1997.

10 Q.   Does SNET believe that financial remedies should apply during the balloting  
11           period?

12 A.   No. It would be inappropriate to apply these standards and impose remedies when  
13           activity levels are expected to be at extraordinary levels. While SNET is  
14           committed to providing quality service during the balloting period no party can  
15           guarantee its performance during this unique time. SNET proposes to continue  
16           tracking all nineteen measurements, but proposes that it should not be subject to  
17           financial remedies during the entire balloting period.

18 Q.   Please list the measurements associated with financial remedies that would be  
19           suspended.

20 A.   Financial remedies would be suspended for the following performance measures:  
21           (1) Reports per Hundred Lines (RPHL), (2) Switch Outage, (3) Maintenance  
22           Appointments Met, (4) Installation Appointments Met, and (5) Mean Time To  
23           Repair (MTTR). However, SNET proposes financial remedies remain in effect for

**SUPPLEMENTAL TESTIMONY OF FRED T. PAGE and MICHAEL L. BENCIVENGO**

1           the three comparability measures. They are: (1) Maintenance Appointments Met,  
2           (2) Installation Appointments Met, and (3) Mean Time to Repair (MTTR).

3    Q.    When will the financial remedies go back into effect for the remaining measures?

4    A.    Full financial remedies would go back into effect on October 1, 1998.

5    Q.    Does this conclude your testimony?

6    A.    Yes.

**Comparison and Analysis of SNET's Proposed Service Measures  
 and those proposed by the Local Competition Users Group (LCUG)**

LCUG Service Quality Measures (SQM)	SNET Service Quality Measures (SQM)	Notes
<b>1. Timeliness of Pre-Ordering Information:</b> <ul style="list-style-type: none"> <li>• ≤ 2 seconds. Query Launch to response = 98%</li> <li>• ≤ 5 seconds. Query Launch to response = 100%</li> </ul>	98 % Average Service Request Acknowledge ≤ 5 seconds.	SNET cannot provide this measure as requested by the LCUG as SNET has no control of a query launch. Response time is dependent on each CLEC' interface system, the size of the downstream data base accessed, length of the record, and the query demand at time of request. SNET's SQM accounts for 98% Average Service Request Acknowledged ≤ 5 seconds.
<b>2. Service Order Interval:</b> <ul style="list-style-type: none"> <li>• No Premise Visit or No Physical Work = 1 day</li> <li>• Premise Visit or Physical Work = 3 day</li> <li>• UNE DS0 Loop/Local Switch &lt; 24 hours</li> <li>• UNE DS1 Loop + Multiplexing &lt; 48 hours</li> <li>• Unbundled DS0 Loop/Local Switch &lt; 24 hours</li> <li>• Unbundled DS1 Loop + Multiplexing &lt; 48 hours</li> <li>• Other Unbundled Loops &lt; 24 hours</li> <li>• Unbundled Switch &lt; 48 hours</li> <li>• Dedicated Transport (DS0/DS1) &lt; 3 days</li> <li>• Dedicated Transport (DS3) &lt; 5 days</li> <li>• Feature Changes &lt; 5 hours</li> <li>• Disconnects (All) &lt; 24 hours</li> <li>• Record Orders (Migration-No-Dispatch) &lt; 24 hours</li> </ul>	<b>Average Service Order Interval Offered:</b> <ul style="list-style-type: none"> <li>• POTS ≤ 5 days</li> <li>• Digital Specials ≤ 10 days</li> <li>• Analog Specials ≤ 13 days</li> <li>• 98% Portability Within Commitment Window</li> </ul>	Fixed intervals, as proposed by the LCUG, would greatly inhibit the flexibility of SNET's work forces (i.e., Inside Forces and/or Outside Forces) by compromising SNET's ability to manage and respond to different peak service order and maintenance work loads. SNET's objective is to offer the best due date possible by dynamically matching its work load to the available work forces.
<b>3. Order Accuracy:</b> <ul style="list-style-type: none"> <li>• ≥ 99% Service Orders Completed Without Error</li> </ul>	3% Assigned Orders to Repair within 72 hours (AOR) – Network Dispositions	SNET cannot control errors generated by a CLEC. AOR measures any service order that results in a network trouble report within 72 hours of completion. It is a more accurate depiction of SNET's performance in that it reflects the quality of all completed service orders.

**Comparison and Analysis of SNET's Proposed Service Measures  
 and those proposed by the Local Competition Users Group (LCUG)**

<p><b>4. Response Time:</b></p> <ul style="list-style-type: none"> <li>• Firm Order Confirmation (FOC) = 100% ≤ 4 hours</li> <li>• Jeopardies Returned 100% ≤ 4 hours</li> <li>• Rejects Returned ≥ 97% within ≤ 15 seconds</li> <li>• Completion's Returned ≥ 97% within ≤ 30 minutes</li> </ul>	<p>90 % Firm Order Confirmation (FOC) ≤ 24 hrs.</p> <p>Installation Appointments Met:</p> <ul style="list-style-type: none"> <li>• POTS = 99.30%</li> <li>• Digital Specials = 90.00%</li> <li>• Analog Specials = 90.00%</li> </ul> <p>No measure</p> <p>98 % Completed Dispatched Service Orders Notification ≤ 2 hours</p>	<p>SNET will provide a FOC measurement, however, <u>100% FOC ≤ 4 hrs.</u> is not reasonable because service requests are sorted and processed by their due date, not as they are received. As an example, service order "B" which is due tomorrow and received after service order "A" which is due in two weeks will be processed first.</p> <p><u>Jeopardies Returned 100% ≤ 4 hours.</u> CLECs will be notified in real time when it is determined that a service request is in jeopardy of being completed on time. Notification of a jeopardy may come from many different sources and at different times in the process flow, including during the installation process. SNET's proposed "Percent Installation Appointments Met" would include any service request missed because of jeopardies.</p> <p><u>Rejects Returned ≥ 97% within ≤ 15 seconds.</u> SNET may be able to develop a measure for EDI and MSAP up front errors <u>only</u> (Not All Rejects).</p> <p><u>Completion's Returned ≥ 97% within ≤ 30 minutes:</u></p> <p><u>Dispatched SOs.</u> This is an Open Query System (OQS)/Work Force Administration (WFA) system performance constraint. Producing the proposed completion report more frequently will degrade the systems performance. SNET may be able to offer 95% ≤ 1 hour but more investigation and evaluation of the systems' performance would be required.</p> <p><u>Non-Dispatched SOs.</u> SNET is investigating the possibility of providing information to report all dispatched and non-dispatched service order completions to CLECs in a semi/fully mechanized mode.</p>
<p><b>5. Held Orders:</b></p> <ul style="list-style-type: none"> <li>• ≤ 0.1% ≥ 15 days</li> <li>• ≤ 0.0% ≥ 90 days</li> </ul>	<p>Installation Appointments Met:</p> <ul style="list-style-type: none"> <li>• POTS = 99.30%</li> <li>• Digital Specials = 90.00%</li> <li>• Analog Specials = 90.00%</li> </ul>	<p>SNET's proposed "Percent Installation Appointments Met" would include any service request missed because of a Held Order.</p>
<p><b>6. Maintenance Time to Restore:</b></p> <ul style="list-style-type: none"> <li>• OOS Dispatch ≤ 4 hours = 90%</li> <li>• OOS Dispatch ≤ 8 hours = 95%</li> <li>• OOS Dispatch ≤ 16 hours = 99%</li> <li>• OOS No Dispatch ≤ 2 hours = 85%</li> <li>• OOS No Dispatch ≤ 3 hours = 95%</li> <li>• OOS No Dispatch ≤ 4 hours = 99%</li> <li>• All Affecting Service (AS) Troubles ≤ 24 hours = 95%</li> </ul>	<p>Mean Time To Repair (MTTR)</p> <ul style="list-style-type: none"> <li>• 21 hrs POTS (Network OOS)</li> <li>• 5.5 hrs Digital and Analog Specials</li> </ul>	<p>The LCUG's proposed objectives are not reasonable from a force management point of view. It would be cost prohibitive for SNET to staff at the levels and skill sets required to meet the proposed objectives. A network mean-time-to-repair measure is a better barometer of SNET's maintenance time to restore and provides the flexibility SNET requires to manage the work load in a cost effective manner. MTTR is already used by the Department as a service measure.</p>

**Comparison and Analysis of SNET's Proposed Service Measures  
 and those proposed by the Local Competition Users Group (LCUG)**

<b>7. Mean Time To Repair <u>All</u> Troubles</b> • Information Only	Mean Time To Repair (MTTR) • 21 hrs POTS (Network OOS) • 5.5 hrs Digital and Analog Specials	An MTTR measure most accurately reflects SNET's maintenance time to restore network related troubles. A MTTR measure for non-network troubles could be negotiated and provided at a cost to individual CLECs.
<b>8. <u>All</u> Repeated Troubles (Line/Circuit/Service):</b> • ≤ 1 % within 60 days	7 % Network Origin-of-Repeats in 7 Days	Percent Repeated Reports is an appropriate measure. SNET now proposes establishing a new measure, 33% Network Repeated Reports Within 30 Days, in place of the original proposed measure of 7 % Network Origin-of-Repeats in 7 Days.
<b>9. Network Trouble Per 100 Lines ≤ 1.5 RPHL</b>	Network Reports/100 Lines (RPHL) ≤ 1.90	SNET proposed this measure with a different objective.
<b>10. Maintenance Appointments Met:</b> • All Troubles ≥ 99%	% Maintenance Appointments Met: • 94.0% POTS Comm. Met • 70.0% Digital Specials Met ≤ 3.5 Hrs.	SNET proposed this measure with a different objective.
<b>11. Systems Availability:</b> • < 0.1% unplanned downtime/month: Pre-Ordering Inquiry Interface Ordering Interface Maintenance Interface	% Availability of Mechanized Interface ≥ 98.9% No measure No measure	MSAP is the pre-ordering, ordering, and maintenance interface.
<b>12. Center Response:</b> • Provisioning > 95% within 20 seconds 100% within 30 seconds • Maintenance > 95% within 20 seconds 100% within 30 seconds	80% Provisioning Center Calls Answered ≤ 20 seconds. 90.4% Maintenance Center Calls Answered ≤ 20 seconds.	SNET proposed this measure with a different objective. Partitioning SNET's "Call Management System" so this measure could be provided at a CLEC level would result in a degradation of service. SNET would lose the economy of size and the flexibility of its answer point resources. An additional break down of this measure, as proposed by the LCUG, may be developed, but the proposed objectives are not reasonable and would have to be determined.
<b>13. Billing Records – Timeliness Of Delivery:</b> (Usage, CSRs, SOs, Time & Materials, Adjustments) • 99.9% Received ≤ 24 hours • 100% Receives ≤ 48 hours  • > 99.95% Wholesale Bills received ≤ 10 days of Bill Date	End-User Usage Data: • 98 % End User Billing Data Distributed in 3 Business Days • 100 % End User Billing Data Distributed in 5 Business Days • 98 % Usage Polling System Availability  Other Billing Data: No measure.  No measure	The proposed LCUG objectives are not reasonable.  <u>End User Billing Data.</u> The coordination of producing "End User Billing Data" is very involved. We have different delivery paths (i.e., DA, Toll, Attempts, etc.). The time it takes to record the data in the switch, collect the data from all switches, process the data, produce the files and then transmit the files to the CLECs is greater than two business days.  <u>Other Billing (e.g., CSRs, SOs, Time &amp; Materials, Maintenance, False Dispatches, Adjustments, etc.).</u> SNET is utilizing current methods and procedures to invoice CLECs for all services rendered. Unique billing arrangements would have to be negotiated with individual CLECs.  SNET may be able to develop this measure. A more appropriate measure would be "98% Wholesale Bills Distributed (mailed, etc.) ≤ 10 Days". At this point receipt of the data is beyond the control of SNET. This process would have to be negotiated with each CLEC and then with SNET's billing vendor as to the billing medium (i.e., EDI, Paper, Tape, All Three, etc.)

**and those proposed by the Local Competition Users Group (LCUG)**

[illegible]

Comparison and Analysis of SNET's Proposed Service Measures  
 and those proposed by the Local Competition Users Group (LCUG)

17. Performance of Network Elements: (LIDB)		
• Reply to All Query Attempts $\geq 99.95\%$	No measure	<u>Reply To Query Attempts</u> (Screened Response) should not be considered. The decision to enable, partially disable, or completely disable data screening is made by SNET for protection of customer data stored in the LIDB against unauthorized queries.
• Query Time-Out $\leq 0.05\%$	No measure	<u>Time-Out</u> should not be considered. The majority of the causes are beyond the control of SNET (e.g., query originator, network problems, intermediate network problems, query originator timer expiration).
• Unexpected Data Values in Replies to Queries $\leq 1\%$ • Quires Missing Customer Record = 0%	No measure No measure	<u>Unexpected Data Values and Missing Customers Record</u> should not be considered. The majority of the causes for these errors (e.g., customer error, operator misdialing, fraud attempts, and CPE malfunctions) are beyond the control of SNET.
• Group Troubles (All Queries) $\leq 0.5\%$	No measure	SNET does not provide this measure to itself. <u>Group Troubles</u> SNET may be able to develop this measure. The ability to collect the data at a CLEC level would have to be researched. Missing Groups would be indicative of the quality of SNET's LIDB. Vacant Groups and Non-participating Groups should be excluded from this count because they are beyond the control of SNET (e.g., customer error, operator misdialing, fraud attempts, CPE malfunctions, and non-participants in the LIDB supported services, etc.)
• Delivery of OS Platform		SNET does not provide this measure to itself. More definition is required before SNET could begin determining the feasibility of providing the measures proposed by the LCUG. It appears that the feasibility study would require significant research and cost. If the measures are possible, they could be negotiated with individual CLECs and provided for a charge.
• Mean Post Dial Delay for 0 Calls from LSO to CLEC OS Platform $\leq 2$ seconds	No measure	<u>Mean Post Dial Delay for 0 Calls from LSO to CLEC OS Platform <math>\leq 2</math> seconds.</u> Further clarification of this measure is required.
• PDD (0+) Calls/6 Digit Analysis from LSO to CLEC OS Platform • 95% < 2.0 seconds • Mean = <1.75 seconds	No measure	<u>PDD (0+) Calls/6 Digit Analysis from LSO to CLEC OS Platform.</u> Further clarification of this measure is required.
• < 0.1% Call Attempts to CLEC OS Platform Blocked	No measure	<u>&lt; 0.1% Call Attempts to CLEC OS Platform Blocked.</u> Further clarification of this measure is required.

**Written Ex Parte of The Southern New England Telephone Company**

RM-9101

October 31, 1997

**Attachment 3:**

"Pre-Filed Testimony of Mr. Steve Allen,"

August 15, 1997



Southern New England Telephone  
227 Church Street  
New Haven, Connecticut 06510  
Phone (203) 771-3802  
Fax (203) 498-7321

Kathleen A. Carrigan  
Senior Counsel

August 15, 1997

Robert J. Murphy, Executive Secretary  
Department of Public Utility Control  
Ten Franklin Square  
New Britain, Connecticut 06051

Re: Docket No. 97-04-23  
Application of The Southern New England Telephone Company's Proposed  
Service Standards and Financial Remedies for Resold Services and Unbundled  
Elements

Dear Mr. Murphy:

The Southern New England Telephone Company ("SNET") herein files an original and eleven (11) copies of the PRE-FILED TESTIMONY of Mr. Steve Allen on behalf of SNET in the above-referenced docket. Also, enclosed is diskette in Word for Windows 6.0 containing the Pre-Filed Testimony.

Service has been made pursuant to §16-1-15 of the Regulations of Connecticut State Agencies.

Should there be any questions concerning this submission, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Kathleen A. Carrigan". The signature is written in a cursive, flowing style.